

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO,
EASTERN DIVISION**

LARRY D. REID, *et al.*,

Plaintiff,

v.

DARRYL D. MOORE,

Defendant.

)
)
)
)
)
)
)
)
)
)

CASE NO.: 1:21-CV 00991

MAGISTRATE JUDGE: J. GREENBER

**ADDENDUM TO MOTION FOR MEDIATION AGREEMENT TO BE SET
ASIDE/RESCINDED BASED ON FRAUD BY THE PLAINTIFF AND DURESS BY THE
DEFENDANT**

NOW Comes, Defendant, Darryl D. Moore, pro se, hereby respectfully moves this honorable Court to set aside/rescind the mediation agreement between the two parties to this litigation based on fraud (i.e., lying) by the Plaintiff in the original filing and duress by the Defendant when he agreed to a mediation agreement.

STATEMENT OF FACTS

Based on previous evidence submitted to the court (video, audio, photographs, and affidavits), the Plaintiff submitted a fraudulent civil lawsuit against the Defendant. In doing so, he intentionally lied under oath in this proceeding. The claims in his filing were erroneous claims against the Defendant. Plaintiff's actions were a deliberate attempt to use this court (via his financial means combined with his employee's constant threats and harassment) to end the exposure of his unethical business dealings and sexual deviance.

Furthermore, the Defendant in this case only signed a mediation after months of around-the-clock threats and harassment that culminated in the granting of two Civil Stalking and

Protection Orders against one employee and known associate of the Plaintiff. The primary person is the PR/mouthpiece/concubine of the Plaintiff named Davyon Augustus. Copies of those orders have already been submitted to this court. During the time that the Plaintiff requested mediation, my father passed away and I contracted Covid. Shortly thereafter, I had a stroke. All of this combined with threats/harassment and not having the funds to continue defending myself in this frivolous lawsuit by an attorney caused me to accept a mediation offer by the Plaintiff under tremendous duress.

On May 20, 2024, the employee for the Plaintiff made two videos discussing me and this case. In video 1, Augustus reads a letter that was sent by a supporter to the courts online. He placed a photo of the person online as well (without his consent). My information was on the screen as well. We both filed a complaint with YouTube.

https://www.youtube.com/live/6Q9gZOAIoIo?si=FT2U8iBU_1l_rN4o

In video 2, Augustus and the Plaintiff appear online together discussing the bogus murder plot of the Plaintiff by me and this case.

https://www.youtube.com/live/-GuL2raxUHo?si=YoO3D5jvqo_bjXTm

Since Davyon Augustus is an employee of the Plaintiff, he is bound by the mediation agreement. Since the signing of the mediation agreement, Augustus has repeatedly made videos attacking and harassing me. The harassment culminated in a Civil Stalking and Protection order being granted to me.

Respectfully submitted,

Darryl D. Moore, *Pro Se*

CONCLUSION

Based upon the facts set forth above and for the reasons thereby outlined above, the Defendants' *Motion* should be granted.

Respectfully submitted,

Darryl D. Moore, *Pro Se*

ATTACHMENTS

CERTIFICATE OF SERVICE

It is hereby certified that a true copy of the foregoing *Motion to Dismiss* was made via USPS mail with sufficient postage attached this __21st__ day of May 2024.

Office of the Clerk
United States District Court
Northern District of Ohio
Carl B. Stokes United States Court House
801 West Superior Avenue
Cleveland, OH 44113-1830

Raymond V. Vasvari, Jr.
Ste. 800
Tower East
20600 Chagrin Blvd
Shaker Heights, OH 44122-5353
216-458-5880
Fax: 216-302-3700
Email: vasvari@vasvarilaw.com

Darryl D. Moore, *Pro Se*